

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|---|---|----------------------------|
| JESSE L. MORGAN, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | Case No. 4:15-cv-1654-SNLJ |
| |) | |
| THE VOGLER LAW FIRM, P.C., et al., |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF JESSE MORGAN’S INTERROGATORIES DIRECTED TO
DEFENDANT RONALD REYNOLDS**

COMES NOW Plaintiff, by and through the undersigned, and pursuant to Federal Rule of Civil Procedure 33, propounds the following interrogatories on Defendant Ronald Reynolds:

DEFINITIONS

As used in these Interrogatories, the following terms have the following meanings.

1. “Document” means any written, printed, typed or other graphic or photographic matter of any nature, and any audio or video recordings in your possession, custody, or control, or known by you to exist or to have existed. As to any material in digital format, specification or identification of such material must include the “platform” on which it was created, the software used to create it, and the media upon which it is stored. All copies of documents containing any alterations, annotations, or that differ in any other way from the originals or copies referred to in the preceding sentence, are deemed separate documents from the originals or copies.

2. “Communicate” or “Communication” means every manner of disclosure or exchange, and every disclosure or exchange, of information, whether orally or by document or whether face-to-face, by telephone, mail, personal delivery or otherwise.

3. “Identify,” used in reference to an individual person, means to state: (a) the person’s full name and present or last known address and (b) the person’s present or last known business position and business affiliation. Identify, used in reference to any other person, means to state the person’s full name and present or last known address, and the type of entity.

4. “Identify,” used in reference to a document, means to state: (a) the date, (b) author or addressor, (c) addressee and recipients of all copies, (d) type of document, and (e) its present location or custodian. Instead of identification of a document, you may furnish the documents for inspection and copying at the time you serve answers to these interrogatories.

5. “Identify,” used in reference to a communication, means to state: (a) its date, (b) the place where it occurred, (c) the type of communication, (d) its substance, (e) the identity of the person who made it, (f) the identity of the person who received it and all other persons present.

6. “Debt” as used herein refers to the balance claimed as due within the December 12, 2014 and January 13, 2015 letters identified within and attached to Plaintiff’s Complaint as Exhibit 1 and Exhibit 3, respectively, as well as the balance claimed as due within the Petition filed in St. Louis County Circuit Court, Case No. 15SL-AC09917.

7. “You” and “Your” as used herein mean Ronald Reynolds and his agents, employees, representatives, or other persons acting or purporting to act on his behalf.

INTERROGATORIES

1. Identify all persons who provided any information or participated in any manner in Your response to these interrogatories, and describe the nature of the individual's involvement.

ANSWER:

2. Identify all agreements between You and Plaintiff relating to 7244 Rockspring Drive, St. Louis, MO 63123.

ANSWER:

3. Identify the date of all communications between You and Plaintiff relating to the Debt.

ANSWER:

4. Identify the date You first spoke with an employee, agent, and/or attorney of The Vogler Law Firm, P.C. regarding the collection of the Debt.

ANSWER:

5. Identify all communications between You and any employee, agent, and/or attorney of The Vogler Law Firm, P.C. relating to the Debt from January 5, 2015 to January 13, 2015.

ANSWER:

6. Identify the date of all other communications between You and any employee, agent, and/or attorney of The Vogler Law Firm, P.C. relating to the Debt prior to November 4, 2015 that are not reflected in Your Answers to Interrogatories Nos. 4 and 5 above.

ANSWER:

7. Identify the date of the “demand for payment” that You alleged was made within paragraph 5 of the Petition filed in *Ronald Reynolds v. Jesse Morgan*, St. Louis County, Missouri Associate Circuit Court Case No. 15SL-AC09917.

ANSWER:

8. With respect to the demand for payment that you identified in Your Answer to Interrogatory No. 7 above, state the amount of the Debt that was demanded.

ANSWER:

9. State every reason You believe You were allowed to assess 9% interest on the amount of \$24,972.00 beginning on January 8, 2015 as requested in the Petition filed in *Ronald Reynolds v. Jesse Morgan*, St. Louis County, Missouri Associate Circuit Court Case No. 15SL-AC09917.

ANSWER:

10. Identify each lawsuit in which You were named as a Defendant or Counter-Defendant from the period of January 1, 2007 to the Present.

ANSWER:

11. From January 1, 2007 to the present, identify each lawsuit in which You were the named Plaintiff for possession of premises that You leased to another.

ANSWER:

12. From January 1, 2007 to the present, identify each lawsuit in which You were the named Plaintiff for recovery of past due rents alleged to be due to You relating to a residential lease.

ANSWER:

13. State whether or not the You have pled guilty to any criminal charges or have any criminal convictions. If so, identify the following: (a) the type of charge – either felony or misdemeanor; (b) identify the court in which any proceedings relating to the charges occurred and provide the case style and case number of any such proceeding; (c) the disposition of the case and punishment; (d) and the conditions of any applicable plea agreement.

ANSWER:

14. From January 1, 2007 to the Present, identify each occupation or employment You held, including the position or positions which you held and the period of time so employed.

ANSWER:

15. From January 1, 2007 to the Present, identify any real property in Missouri that You owned. For each such property, include the dates of Your ownership.

ANSWER:

16. From January 1, 2007 to the Present, identify any real property in Missouri that was owned by a business of which You were a member or officer. For each such property, include the name of the business who owned the property and the dates of the business's ownership.

ANSWER:

17. From January 1, 2007, identify the address(es) of any property at which Plaintiff performed work at Your request.

ANSWER:

18. Identify each credit You made to the amount due for Plaintiff's monthly rental payments relating to 7244 Rockspring Drive, St. Louis, MO 63123. For each credit, state the amount of the credit, the date of the credit, and the reason for the credit.

ANSWER:

19. State the date Plaintiff was evicted from 7244 Rockspring Drive, St. Louis, MO 63123.

ANSWER:

BRODY & CORNWELL

/s/ Bryan E. Brody
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Alexander J. Cornwell, #64793MO
1 North Taylor Ave.
St. Louis, Missouri 63108
Phone: (314) 932-1068
bbrody@ brodyandcornwell.com
acornwell@brodyandcornwell.com

CERTIFICATE OF SERVICE

The undersigned attests that, on January 18, 2017, a copy of Plaintiff Jesse L. Morgan's Interrogatories to Defendant Vincent D. Vogler was served via email on the following counsel of record:

Karl W. Dickhaus
E-Mail: kdickhaus@attystl.com

Michael A. Kasperek
E-Mail: mkvoglaw@earthlink.net

/s/ Bryan E. Brody

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

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| JESSE L. MORGAN, |) | |
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| Plaintiff, |) | |
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| vs. |) | Case No. 4:15-cv-1654-SNLJ |
| |) | |
| THE VOGLER LAW FIRM, P.C., et al., |) | |
| |) | |
| Defendants. |) | |

**PLAINTIFF JESSE MORGAN’S REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT RONALD REYNOLDS**

COMES NOW Plaintiff, Jesse L. Morgan, by and through his undersigned counsel, and pursuant to Federal Rule of Civil Procedure 34, submits the following Requests for Production of Documents to be answered by Defendant Ronald Reynolds.

DEFINITIONS

As used in these Requests for Production, the following terms have the following meanings.

1. “Document” means any written, printed, typed or other graphic or photographic matter of any nature, and any audio or video recordings in your possession, custody, or control, or known by you to exist or to have existed. As to any material in digital format, specification or identification of such material must include the “platform” on which it was created, the software used to create it, and the media upon which it is stored. All copies of documents containing any alterations, annotations, or that differ in any other way from the originals or copies referred to in the preceding sentence, are deemed separate documents from the originals or copies.

2. “Communicate” or “Communication” means every manner of disclosure or exchange, and every disclosure or exchange, of information, whether orally or by document or whether face-to-face, by telephone, mail, personal delivery or otherwise.

3. “Identify,” used in reference to an individual person, means to state: (a) the person’s full name and present or last known address and (b) the person’s present or last known business position and business affiliation. Identify, used in reference to any other person, means to state the person’s full name and present or last known address, and the type of entity.

4. “Identify,” used in reference to a document, means to state: (a) the date, (b) author or addressor, (c) addressee and recipients of all copies, (d) type of document, and (e) its present location or custodian. Instead of identification of a document, you may furnish the documents for inspection and copying at the time you serve answers to these interrogatories.

5. “Identify,” used in reference to a communication, means to state: (a) its date, (b) the place where it occurred, (c) the type of communication, (d) its substance, (e) the identity of the person who made it, (f) the identity of the person who received it and all other persons present.

6. “Debt” as used herein refers to the balance claimed as due within the December 12, 2014 and January 13, 2015 letters identified within and attached to Plaintiff’s Complaint as Exhibit 1 and Exhibit 3, respectively, as well as the balance claimed as due within the Petition filed in St. Louis County Circuit Court, Case No. 15SL-AC09917.

7. “You” and “Your” as used herein mean Ronald Reynolds and his agents, employees, representatives, or other persons acting or purporting to act on his behalf.

REQUESTS FOR PRODUCTION

1. All agreements between You and The Vogler Law Firm, P.C. relating to the Debt.

RESPONSE:

2. Any written communications between You and the employees, agents, and/or officers of The Vogler Law Firm, P.C. relating to the Debt dated prior to December 12, 2014.

RESPONSE:

3. Any written communications between You and the employees, agents, and/or officers of The Vogler Law Firm, P.C. relating to the Debt dated December 12, 2014 to January 12, 2015.

RESPONSE:

4. Any written communications Any written communications between You and the employees, agents, and/or officers of The Vogler Law Firm, P.C. relating to the Debt dated January 13, 2015 to April 12, 2015.

RESPONSE:

5. Any written communications between You and the employees, agents, and/or officers of The Vogler Law Firm, P.C. relating to the Debt dated April 13, 2015 to November 3, 2015.

RESPONSE:

6. A copy of Your individual Form 1040 that You filed with the Internal Revenue Service for Tax Years 2013, 2014, 2015 and, if applicable, 2016.

RESPONSE:

7. Records of calls, emails, texts, and/or communications made to You from Plaintiff.

RESPONSE:

8. Records of calls, emails, texts, and/or communications made to Plaintiff from You.

RESPONSE:

9. All documents, audiotapes, electronic data, voice-files, and/or transcripts pertaining to all telephone calls You placed in an effort to contact Plaintiff and/or to collect the Debt.

RESPONSE:

10. Any written communications between You and Plaintiff relating to the Debt dated prior to December 12, 2014.

RESPONSE:

11. A copy of all written agreements between You and Plaintiff pertaining to 7244 Rockspring Drive, St. Louis, MO 63123.

RESPONSE:

12. A copy of the lease between You and Plaintiff pertaining to 7244 Rockspring Drive, St. Louis, MO 63123.

RESPONSE:

13. All documents which show the credit(s) You made to the balance Plaintiff owed for his monthly rental payments relating to 7244 Rockspring Drive, St. Louis, MO 63123.

RESPONSE:

14. A copy of the written itemized list of the damages for which You withheld Plaintiff's security deposit or any portion thereof.

RESPONSE:

15. All documents You identified in Your answers to Plaintiff's Interrogatories.

RESPONSE:

16. A copy of each insurance policy (and declarations page for each policy) that provides or may provide coverage for any of the claims asserted with the Complaint filed in this case.

RESPONSE:

17. A copy of each check or money order You sent Plaintiff.

RESPONSE:

18. A copy of each insurance policy (and declarations page for each policy) that provides or may provide You coverage for potential violations of the Missouri Merchandising Practices Act committed from January 1, 2007 to the Present.

RESPONSE:

19. A copy of the Complaint or Petition from each lawsuit in which you were named as a Defendant and/or Counter-Defendant from January 1, 2007 to the Present.

RESPONSE:

20. Screen shots of each possible screen that can be displayed on the software program or other electronic system You use for ordinary, general record-keeping in Your lessor activities that contain information relating to the Debt and/or Plaintiff's occupancy of 7244 Rockspring Drive, St. Louis, MO 63123.

RESPONSE:

21. Produce a complete log that sets forth any documents withheld on the basis of any privilege or doctrine that describes (1) the type of document withheld; (2) the date the document was created; and (3) a detailed explanation of the privilege or doctrine being asserted.

RESPONSE:

BRODY & CORNWELL

/s/ Bryan E. Brody
Bryan E. Brody, #57580MO
Alexander J. Cornwell, #64793MO
1 North Taylor Ave.
St. Louis, Missouri 63108
Phone: (314) 932-1068
bbrody@brodyandcornwell.com
acornwell@brodyandcornwell.com

CERTIFICATE OF SERVICE

The undersigned attests that, on January 18, 2017, a copy of Plaintiff Jesse L. Morgan's Requests for Production to Defendant Ronald Reynolds was served via email on the following counsel of record:

Karl W. Dickhaus
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/s/ Bryan E. Brody_____